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12	IN THE UNITED STATES DISTRICT COURT	
13	FOR THE EASTERN DISTRICT OF WASHINGTON	
14		
15	PREPARED FOOD PHOTOS, INC.	
16	f/k/a ADLIFE MARKETING &	Civil Action No. 2:23-cv-00160-TOR
	COMMUNICATIONS CO., INC.,	
17	Plaintiff,	
18	,	JOINT MOTION TO EXTEND
19	V.	DISCOVERY CUTOFF
20	POOL WORLD, INC.,	
21		
	Defendant.	
22		
23		
24		
25	Plaintiff Prepared Food Phot	os Inc f/k/a Adlife Marketing &

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Communications Co., Inc. ("<u>Plaintiff</u>") and defendant Pool World, Inc. ("<u>Defendant</u>") (collectively, the "<u>Parties</u>") hereby file this joint motion to extend the current discovery cutoff by a period of three (3) weeks, and state as follows:

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- 1. Pursuant to the Second Amended Jury Trial Scheduling Order (the "Scheduling Order") [D.E. 87], the current discovery cutoff is August 29, 2025.
- 2. The Parties are hereby requesting that the Court extend the discovery cutoff by three (3) weeks (to September 19, 2025) while leaving in place the remaining deadlines in the Scheduling Order.
- 3. The extension is being requested for the following reasons: (a) medical issues, including the hospitalization of one of Plaintiff's witnesses and other ongoing family medical issues (raised in the parties' prior joint motion to extend deadlines) for a second witness have prevented the parties from taking such depositions and (b) summer travel/professional schedules of both the parties and counsel which have likewise made deposition scheduling difficult.
- 4. The parties do not intend to otherwise alter the Scheduling Order, and therefore the requested extension will not interfere with the dispositive motion deadline, trial, etc.
- 5. Given the Parties' mutual desire to extend the discovery cutoff to provide more time to complete depositions, good cause exists for such amendment.

WHEREFORE, the Parties respectfully request that the Court enter an

1	Order extending the discovery cutoff to September 19, 2025.	
2		
3	DIVERSIDE LAW CROUD DI LC	/g/ Doul Alon Lovy
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## **CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

## /s/ Lauren Hausman

Lauren Hausman, Esq.